

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

RICHARD BEALL,

PLAINTIFF,

v.

DALLAS POLICE, ET AL.,

DEFENDANTS.

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No. 3-06-CV-0733-D

PLAINTIFF RICHARD BEALL'S PRETRIAL DISCLOSURES

Plaintiff Richard Beall makes the following pretrial disclosures pursuant to Rule 26(a)(3)(A)-(C) of the Federal Rules of Civil Procedure.

I. WITNESSES

A. Witnesses Plaintiff Expects to Present at Trial

1. Richard Beall
2467 Mallory Lane
Lancaster, Texas 75134
(214) 282-7767
2. Delores Beall
P.O. Box 41614
Dallas, Texas 75241
(214) 228-8620

3. Michael Beall
2521 56th Street
Dallas, Texas 75241
(214) 374-5752
4. Ryan Akers
2139 56th Street
Dallas, Texas 75241
(214) 371-3011
5. Stephanie Allen
2517 56th Street
Dallas, Texas 75241
(214) 371-6407
6. Kym Morris
2511 56th Street
Dallas, Texas 75241
(214) 801-9746

B. Witnesses Plaintiff May Present at Trial

7. Shelby Angel
Michelle Chenault
Connor Sheehan
3000 Thanksgiving Tower
1601 Elm Street
Dallas, Texas 75201
(214) 999-3000
8. Custodian of Records for I Am That I Am Academy
9. Rebuttal and/or impeachment witnesses

II. DEPOSITION DESIGNATION

None.

III. EXHIBITS (exhibits that may offer are designated by an asterisk)

1. Motion to dismiss criminal prosecution [RB-00001]*
2. July 16, 2004 Court Order revoking probation
3. Richard Beall's Complaint to Dallas Police Department [RB-00935]*
4. Richard Beall's 2004 W-2 [RB-01138]
5. Richard Beall's I Am That I Am Academy employee information [RB-01139]
6. Richard Beall's I Am That I Am Academy February 2004 salary information [RB-01140]
7. I Am That I Am Academy 2002-2004 General Ledger [RB-01141-01163]
8. Methodist Hospital medical records with affidavit [RB-00425-00464]
9. BlueCross BlueShield of Texas insurance coverage records with affidavit [RB-01064-01084]
10. Genesis Chiropractor medical records with affidavit [RB-01085-01137]
11. St. Paul University Hospital medical records with affidavit [RB-01170-01188]
12. Photographs of Richard Beall's injuries and location of incident [RB-01196-01200]
13. CBS Channel 11 news segment video [RB-01201]

Respectfully submitted,

/s/ Shelby Angel

Cynthia Hollingsworth
State Bar No. 09879500
Shelby D. Angel
State Bar No. 24040440

**GARDERE WYNNE SEWELL
LLP**

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**ATTORNEYS FOR PLAINTIFF
RICHARD BEALL**

CERTIFICATE OF SERVICE

Pursuant to the Federal Rules of Civil Procedure and LR 5.1, I hereby certify that on March 7, 2008, a true and correct copy of the foregoing document was forwarded to the following counsel via electronic filing:

Jason Schuette
1500 Marilla Street 7CN
Dallas, Texas 75201

/s/ Shelby Angel